

# Problem Identification and Resolution

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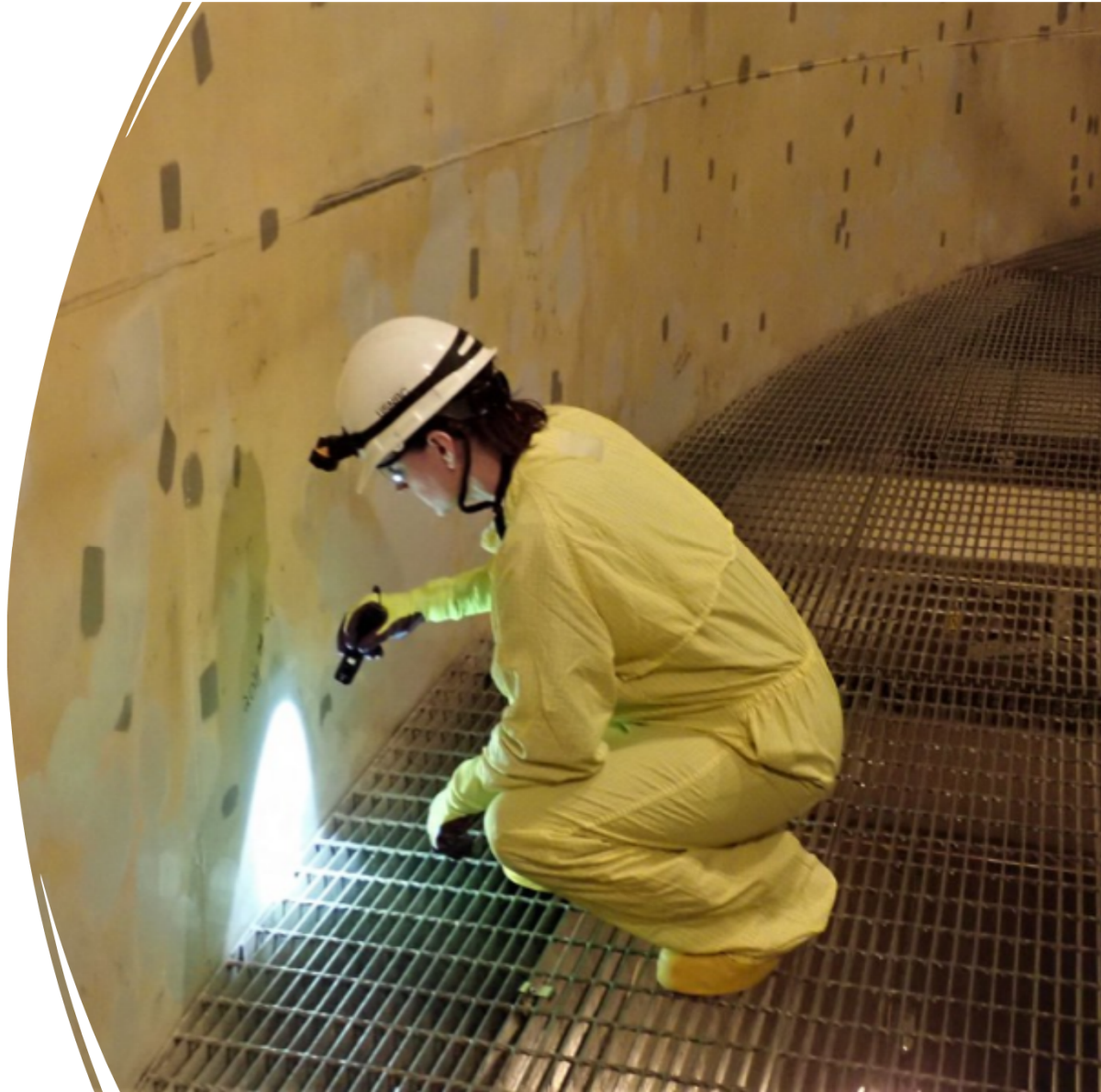
# Background

- SECY 19-0067, “Recommendations for Enhancing the Reactor Oversight Process” (ML19070A036) had two recommendations
  - Triennial Team Inspection
  - Comprehensive PI&R Review
- Comprehensive Review completed fall 2020 (ML20247J590)
- SECY 19-0067 retracted fall 2021 (ML21217A284)
- IP 71152 revision issued in winter 2021 (ML21281A181)
  - Updated format
  - Updated SCWE guidance
  - Moved daily review to IMC 2515D, “Plant Status” (ML22251A314)

# Inspection Frequency

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- “The...comprehensive review of the inspection objectives and data did not produce data that supports or refutes shifting the team inspection from biennial to triennial.” (ML20247J590, pg. 5)
- SECY 21-0087, “Recommendation for Problem Identification and Resolution Team Inspection Frequency,” (ML22145A448) submitted fall 2022 to recommend maintaining biennial frequency





## Commission Direction

- SRM-SECY-22-0087  
(ML23062A686) issued in early 2023
  - approved maintaining the PI&R team inspection at a biennial frequency
  - also stated that the current inspection hours for the procedure should be maintained



# Comprehensive Review Recommendations

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- Focus effort on assessment of licensees' identification, prioritization, evaluation, and corrective action abilities
- Incorporate audits, self-assessments, and operating experience inspection efforts into other elements
- Update and clarify SCWE inspection, revise questions, clarify guidance on when and how teams can and should shift to IP 93100 guidance and qualification requirements for focus group facilitators
- Incorporate guidance for the team to use to develop inspection insights for more consistent and repeatable "assessment" of licensee's PI&R programs



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# IP 71152 Revision in Progress

- Addresses Comprehensive Review recommendation to add assessment guidance for documentation – does NOT add any additional oversight mechanisms
- Does NOT remove separate requirements to review licensee audits, self assessments and operating experience programs
- Continues to reformat procedure to modernize it and bring it into current IMC 0040 requirements
- Will close all outstanding ROP feedback forms and lessons learned actions related to IP 71152
- Will also update IMC 0611 governance for documentation (ML22339A153 and ML17129A591), and IMC 0308 inspection bases (ML19056A200)
- Intention is that the final revision will not substantively change how a PI&R team inspection is currently conducted, but will provide clearer guidance for inspectors when documenting their assessments

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# Questions

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## Assessment Option 3

- Performance criteria for assessment in the areas of identification, evaluation, correction of plant problems and SCWE
  - In each of these areas, there are success criteria that demonstrate what an effective PI&R program looks like
    - Example: Licensee staff enter conditions into the licensee's PI&R program at a low threshold.
  - The guidance also includes observations
    - Example: A failure to identify or enter an SCAQ into the PI&R program.
- The goal is to provide clearer guidance on how to assess the effectiveness of the licensee's PI&R program